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Attorneys for Defendant  
 TARGET CORPORATION f/k/a DAYTON  
 HUDSON CORPORATION erroneously sued  
 and served as TARGET CORPORATION and  
 DAYTON HUDSON CORPORATION

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

JONIECE THOMAS, an individual,

Plaintiff,

v.

TARGET CORPORATION, a Minnesota  
 corporation; DAYTON HUDSON  
 CORPORATION, an Minnesota corporation;  
 DOE 1 (STORE MANAGER); and DOES 2-50,  
 inclusive,

Defendants.

Case No. 24-cv-07801-DMR

**STIPULATION AND ORDER (AS  
 MODIFIED) CONTINUING ADR  
 COMPLETION DEADLINE AND  
 FURTHER CASE MANAGEMENT  
 CONFERENCE**

Complaint Filed: August 23, 2024  
 Trial Date: August 6, 2026

Plaintiff Joniece Thomas and Defendant Target Corporation f/k/a Dayton Hudson Corporation (the “Parties”), by and through their counsel of record, enter this stipulation and seek the Court’s approval of a continuance of the current ADR deadline and Case Management Conference.

1. This lawsuit arises out of a trip and fall accident at a Target store on September 8, 2023.
2. Trial is set for April 6, 2026 at 8:30 a.m.

3. The Parties previously agreed and were ordered by this Court to participate in ADR by June 6, 2025.
4. A Further Case Management Conference is scheduled for June 18, 2025 at 1:30 P.M.
5. The Parties have not participated in ADR by the Court's deadline and seek approval to continuing the deadline to complete ADR.
6. The Parties are scheduled to mediate with mediator Nicholas Pastore on August 8, 2025 at 10:30 a.m., which is after the Court's deadline to complete ADR.
7. The Parties reasonably believe that this matter will be resolved before or through the scheduled mediation given the interactions of counsel and exchange of discovery that has taken place. As such, the Parties believe it would serve the interests of judicial economy to continue the Case Management Conference until after the completion of mediation (should this Court grant the request).
8. The Parties acknowledge and accept that this request should have been made sooner and appreciate the Court's willingness to consider the stipulation of the parties.
9. In light of the foregoing, the Parties respectfully request that the Court continue the ADR deadline and Case Management Conference to a date on or after August 11, 2025.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

*/s/ Timothy Ghobrial*

DATED: June 6, 2026

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Timothy Mina Ghobrial  
DOWNTOWN LA LAW GROUP  
Attorneys for Plaintiff JONIECE THOMAS

*/s/ Lauren A. Pagan*

DATED: June 6, 2025

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Mary Kay Glaspy  
Lauren A. Pagan  
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Attorneys for Defendant TARGET  
CORPORATION f/k/a DAYTON  
HUDSON CORPORATION

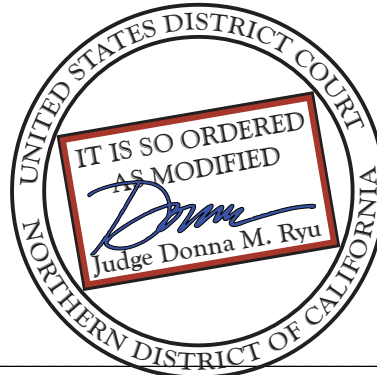
**ORDER (AS MODIFIED)**

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

The Deadline to Complete ADR is continued to August 29, 2025. The Further Case Management Conference is continued to September 3, 2025 at 1:30 p.m. in Oakland, by by Videoconference only. Parties shall file an updated joint case management conference statement by August 27, 2025. All counsel and parties may access the webinar information (public hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>.

IT IS SO ORDERED AS MODIFIED.

DATED: June 9, 2025



Chief Magistrate Judge Donna M. Ryu